

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Mawuli K Nyaku	:	Chapter 13
	:	Case No.: 23-11728-PMM
Debtor	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Mawuli K Nyaku (the “Debtor”), by and through their undersigned counsel,
hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. The Debtor filed a Chapter 13 Bankruptcy on or about June 13, 2023 (the “Petition Date”).
2. The Chapter 13 Plan was confirmed by this Honorable Court on or about May 07, 2024.
3. On June 07, 2024, Toyota Motor Credit Corporation (the “Vehicle Lender”) filed a Motion for Relief from Stay with respect to the Debtor’s vehicle.
(Docket No. 56)
4. On June 17, 2024, the Debtor filed a response to the Motion for Relief.
(Docket No. 61)
5. The Debtor has entered into a stipulation with the Vehicle Lender to resolve the Motion for Relief which provides for payment of post-petition vehicle arrears in the Debtor’s chapter 13 plan.
6. Accordingly, the Debtor is filing the instant Motion to Modify their chapter 13 plan to provide for payment of the post-petition vehicle arrears.
7. The Debtor has paid \$113,593.00 to the Chapter 13 Trustee to date.

8. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$9,674.00 per month for 45 months for a new base amount of \$548,923.00.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan.

Dated: October 11, 2024

/s/Brad J. Sadek, Esq
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